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MEMO ENDORSED

May 30, 2008

The Honorable Steven R. Robinson  
United States District Court Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

VIA FAX 914-390-4179

Re: United States v. Hector Barreras  
07 Cr. 812 (SCR)

Dear Judge Robinson:

On February 28, 2008, the Court held a hearing on defendant's suppression motion. At that time the Court ordered the government to turn over to the defense "any additional video from the scenes that we've had excerpts here today of" (Tr. At 79). To date, nothing additional has been turned over.

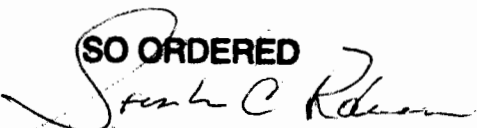
Yesterday, I had a phone conversation with AUSA McQuaid in which he indicated that he is in possession of 4 CD's of additional video surveillance which he intends to mail to me right away. Depending upon the content of the video, there is a chance that the defense may make a motion to reconsider. Therefore, I write to request an extension of time in order that I may receive and view same and properly consider such a motion. As your Honor's decision denying the defendant's motion to suppress is dated April 30, 2008, today is the deadline to file a motion to reconsider. Accordingly, I respectfully request that the Court extend the time to possibly file a motion to reconsider.

Respectfully,

  
LAWRENCE M. FISHER, ESQ.

Cc: AUSA Nicholas McQuaid

Defendant has until 6/30/08  
to seek leave to file motion  
to reconsider.

SO ORDERED  
  
STEPHEN C. ROBINSON  
UNITED STATES DISTRICT JUDGE 6/2/08